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9 Attorneys for Defendants
APEX MATERIALS, LLC, ELKHORN
10 ENVIRONMENTAL, LLC, WERDCO BC,
INC., WERDCO LLC, BRENT CONRAD,
11 BRANDON CONRAD, PATRICIA CONRAD, and
HARBER COMPANY, INC.
12

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 LANCE D. STUCKEY, JR., Individually and
16 on behalf of all others similarly situated,

17 Plaintiffs,

18 v.

19 APEX MATERIALS, LLC, ELKHORN
ENVIRONMENTAL, LLC, WERDCO BC,
20 INC., WERDCO LLC, BRENT CONRAD,
BRANDON CONRAD, PATRICIA CONRAD,
21 LAS VEGAS PAVING CORPORATION.,
TAB CONTRACTORS, INC., WILLIAM
CHARLES CONSTRUCTION COMPANY,
22 HARBER COMPANY, INC., John Does I to
XX, name fictitious true name and number of
23 persons being unknown, and XYZ Corporations
I to XX, name fictitious true name of number
24 of entities being unknown,

25 Defendants.

Case No. 2:22-cv-01964-APG-VCF

**STIPULATION AND ~~PROPOSED~~
ORDER TO STAY MATTER IN ITS
ENTIRETY PENDING GLOBAL
SETTLEMENT**

[FIRST REQUEST]

26
27 Plaintiff, LANCE D. STUCKEY, JR. ("Plaintiff"), and Defendants, APEX MATERIALS,
28 LLC, ELKHORN ENVIRONMENTAL, LLC, WERDCO BC, INC., WERDCO LLC, BRENT

1 CONRAD, BRANDON CONRAD, PATRICIA CONRAD (the “Conrad Defendants”), LAS
 2 VEGAS PAVING CORPORATION (“Las Vegas Paving”), TAB CONTRACTORS, INC.
 3 (“TAB”), WILLIAM CHARLES CONSTRUCTION COMPANY (“William Charles”), and
 4 HARBER COMPANY INC. (“Harber”) (collectively herein “Defendants”), by and through their
 5 respective undersigned counsel, hereby request and stipulate that the Court stay all case deadlines
 6 for all parties to this litigation for twenty-one (21) days from the date of this Stipulation pending
 7 execution of settlement documents and submission of a subsequent stipulation and order to dismiss
 8 the matter in its entirety with prejudice.

9 The parties have reached an agreement to globally settle and resolve this matter in its
 10 entirety for all claims and all parties to the litigation. The parties make this request to permit time
 11 to prepare necessary settlement documents, a stipulation and order to dismiss the matter in its
 12 entirety with prejudice, and any other documents necessary to close the matter.

13 Pursuant to this Stipulation, all responsive pleading deadlines shall be extended by twenty-
 14 one (21) days from the date of this Stipulation up to and including May 4, 2023. Nonetheless, the
 15 parties intend to submit a stipulation and order to dismiss the matter in its entirety with prejudice
 16 within twenty-one (21) days from the date of this Stipulation.

17 This Stipulation is submitted in good faith and not for the purpose of undue burden or delay.

18
 19 Dated: April 13, 2023

Dated: April 13, 2023

20 Respectfully submitted,

Respectfully submitted,

21 /s/ Leon Greenberg

/s/ Michael D. Dissinger

22 LEON GREENBERG, ESQ.

MONTGOMERY Y. PAEK, ESQ.

23 RUTHANN DEVEREAUX-GONZALEZ,
 24 ESQ.

EMIL S. KIM, ESQ.

25 LEON GREENBERG PROFESSIONAL
 26 CORPORATION

MICHAEL D. DISSINGER, ESQ.

LITTLER MENDELSON, P.C.

27 Attorneys for Plaintiff

28 LANCE D. STUCKEY, JR.

Attorneys for Defendants

APEX MATERIALS, LLC, ELKHORN
 ENVIRONMENTAL, LLC, WERDCO BC,
 INC., WERDCO LLC, BRENT CONRAD,
 BRANDON CONRAD, PATRICIA
 CONRAD, and HARBER COMPANY, INC.

1 Dated: April 13, 2023

Dated: April 13, 2023

2 Respectfully submitted,

Respectfully submitted,

3 /s/ Lynne K. McChrystal

/s/ Nicole E. Lovelock

4 PAUL T. TRIMMER, ESQ.
5 LYNNE K. MCCHRYSTAL, ESQ.
6 JACKSON LEWIS P.C.

NICOLE E. LOVELOCK, ESQ.
DONNA DIMAGGIO, ESQ.
JONES LOVELOCK

7 Attorneys for Defendant
8 WILLIAM CHARLES CONSTRUCTION
9 COMPANY

Attorneys for Defendant
TAB CONTRACTORS, INC.

10 Dated: April 13, 2023

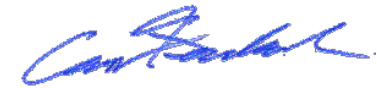
11 Respectfully submitted,

12 /s/ Tye S. Hanseen

13 TYE S. HANSEEN, ESQ.
14 MARQUIS AURBACH COFFING

15 Attorneys for Defendant
16 LAS VEGAS PAVING CORPORATION

17
18
19
20 IT IS SO ORDERED.

21 

22 Cam Ferenbach
23 United States Magistrate Judge

24 DATED 4-18-2023